

ANNUAL AIR MONITORING NETWORK PLAN CHECKLIST

Year:

Agency:

Blue = fields that would be filled in during ANP review

40 CFR 58.10(a) specifies the following monitors as being included in the ANP: SLAMS monitoring stations including FRM, FEM, and ARM monitors that are part of SLAMS, NCore stations, STN stations, State speciation stations, SPM stations, and/or, in serious, severe and extreme ozone nonattainment areas, PAMS stations, and SPM monitoring stations.

EPA R9 will withhold approval of all items that EPA HQ has approval authority. We will do a check to see if the information is included and correct. The items that have EPA HQ approval authority are: PAMS, NCore, Speciation (STN/CSN), and [NO2 requirements includeing near road, area-wide, and RA40].

	ANP requirement	Citation within 40 CFR 58	Was the info submitted? If yes, page #s	Action if info is missing or incorrect	Does it meet the req?	Action if req. is not met (assumes correct info submitted)	Notes (for now on req. but ultimately for review notes)	Informs network adeq?	Critical for ANP app? ¹
1.	July 1 st due date	58.10 (a)(1)		Request plan be submitted ASAP.		ANP approval can happen within 120 days of when	shall submit	N	N

Comment [m1]: Create cheat-sheet for requirement plus non-blue columns. Also include instructions on cheat sheet.

¹ This identifies critical criteria for approval (i.e., partial disapproval if requirement is not met). All other network plan information is WOE.

Critical is based on:

- 40 CFR 58.10 says “must include” or “shall provide”
- 40 CFR 58, App A – pick the critical ones and all else WOE
- 40 CFR 58, App C – ID as critical if requirement is “must”
- 40 CFR 58, App D – ID as critical if requirement is “must”
- 40 CFR 58, App E – none are critical since these need to be followed “to the extent possible”

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						delinquent plan is received			
2.	Statement of purpose for each monitor	58.10 (a)(1)		Add/correct in following year's plan	Yes if correct info was submitted	No impact on current year's approval	Shall include	N	Y
3.	30-day public comment / inspection period ²	58.10 (a)(1), 58.10 (a)(2)		Put out for comment and resubmit		EPA provide comment period	Shall/must provide	N	Y
4.	Modifications to SLAMS network – case when we are not approving actual system modifications (i.e., we will do it outside the ANP process)	58.10 (a)(2)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Subject to approval by RA	N	Y
5.	Modifications to SLAMS network – case when we are approving actual system modifications	58.10 (a)(2)		Add/correct in following year's plan or letter and withhold approval of that portion	Yes if correct info was submitted and 58.14(c) has been met	If 58.14(c) has not been met then withhold approval of system modification but can approve that the plan	Subject to approval by RA	N	Y

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² Comment period required by either EPA or S/L/T agency if modifications are proposed to the SLAMS network. Otherwise an inspection period is required by the S/L/T agency.

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						included the list of modifications			
6.	Does plan include documentation for system modifications that have been approved since last ANP approval?			Add/correct in next year's plan.	Yes if correct info was submitted	N/A – req. met if correct info submitted	No formal requirement but OGC request	Y	N
7.	NCore plan submitted to Admin. by 7/1/2009	58.10 (a)(3)		Ask for plan ASAP	N/A – HQ app.	N/A – HQ app.	Shall HQ app.	N	N
8.	NCore site operational by 1/1/2011	58.10 (a)(3)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for ... HQ app.	N	Y
9.	Pb plan for ≥ 1.0 tpy sources by 7/1/2009	58.10 (a)(4)		Ask for (correct) plan ASAP and withhold approval of that portion		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
10	Pb site for ≥ 1.0 tpy sources operational by 1/1/2010	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of		Withhold approval of that portion	Plan shall provide for ...	Y	Y

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				that portion					
11	Pb plan for 0.5-1.0 tpy by 7/1/2011	58.10 (a)(4)		Ask for plan ASAP		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
12	Pb site for 0.5-1.0 tpy sources operational by 12/27/2011	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for ...	Y	Y
13	NO2 plan for area-wide and RA40 sites by 7/1/2012	58.10 (a)(5)		Add/correct in following year's plan and withhold approval of that portion		2012: Withhold approval of that portion since HQ app.	Shall HQ app.	N	N
14	NO2 area-wide and RA40 sites operational by 1/1/2013	58.10 (a)(5)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for ...	Y – starting in 2013 ANPs	Y – starting in 2013 ANPs
15	NO2 plan for near-road sites	58.10 (a)(5)		Ask for plan		2012:	Shall	N	N

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	by 7/1/2012			ASAP (public comment period required)		Withhold approval of that portion since HQ app.	HQ app.		
16	NO2 near-road sites operational by ? (N/A until 2013 or 2014 plans)	58.10 (a)(5)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion ?	Plan shall provide for ...	Y – starting in 2013 or 2014 ANPs (dep on rule change)	Y – starting in 2013 or 2014 ANPs (dep on rule change)
17	SO2 plan for PWEI sites by 2011	58.10 (a)(6)		Ask for plan ASAP (public comment period required)		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
18	SO2 sites operational by 1/1/2013	58.10 (a)(6) and 58.13(d)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for...	Y	Y
19	CO plan for 2015 near-road sites by 7/1/2014	58.10 (a)(7) and 58.13(e)(1)		Ask for plan ASAP (public		If the submitted plan does not	Shall	N	Y – starting in 2014

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				comment period required)		meet the requirements: withhold approval of that portion			ANPs
20	CO sites for first phase of CO monitors operational by 1/1/2015	58.10 (a)(7) and 58.13(e)(1)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for...	Y – starting in 2015 ANPs	Y – starting in 2015 ANPs
21	CO plan for 2017 near-road sites by 7/1/2016	58.10 (a)(7) and 58.13(e)(2)		Ask for plan ASAP (public comment period required)		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y – starting in 2016 ANPs
22	CO sites for first phase of CO monitors operational by 1/1/2017	58.10 (a)(7) and 58.13(e)(2)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for...	Y – starting in 2017 ANPs	Y – starting in 2017 ANPs
23	AQS site identification number for each site	58.10 (b)(1)		Add/correct in following year's plan and	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y

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Comment [g2]: Should the 58.10 stuff be combined with the App. D 1.1 stuff? (Like, all the stuff they might have in the individual site tables could be grouped together in this checklist?)

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				withhold approval of that portion					
24	Location of each site: street address and geographic coordinates	58.10 (b)(2)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
25	Sampling and analysis method(s) for each measured parameter	58.10 (b)(3)		Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	N	Y
26	Operating schedule for each monitor	58.10 (b)(4)		Add/correct in following year's plan and withhold approval of that portion		If operating schedule does not meet req: withhold approval of that portion (can be monitor specific)	Must contain following information	Y	Y
27	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)		Add/correct in following year's plan and withhold	Yes if correct info was submitted, (assumes	N/A – req. met if correct info submitted	Must contain following information	Y	Y

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				approval of that portion	we are not approving the changes in ANP)				
28	Monitoring objectives ³ for each monitor as defined in Appendix D	58.10(b)(6); App. D		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N – reconsider if non-NAAQS objectives can be non-reg	Y
29	Scale of representativeness for each monitor as defined in Appendix D			Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	Y	Y
30	Identification of sites suitable and sites not suitable for comparison to the annual PM2.5 NAAQS as described in Part 58.30	58.10 (b)(7)		Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	Y	Y
31	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)		Add/correct in following year's plan and	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y

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³ Site type is considered later.

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				withhold approval of that portion					
32	The designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
33	Any source-oriented Pb site for which a waiver has been granted by EPA RA	58.10 (b)(10)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
34	Any Pb monitor for which a waiver has been requested or granted by EPA RA for us of Pb-PM10 in lieu of Pb-TSP	58.10 (b)(11)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
35	Identification of required NO2 monitors as either near-road or area-wide	58.10 (b)(12)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Must contain following information	Y	Y

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36	Document how states and local agencies provide for the review of changes to a PM2.5 monitoring network that impact the location of a violating PM2.5 monitor. ⁴	58.10 (c)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	If the process for the review of changes to the PM2.5 network does not meet the req: withhold approval of that portion.	must	N	Y
37	Plan to modify the network that complies with findings of the 5-year network assessment. [Note: recommended to be submitted on year of network assessment or year after.]	58.10 (e) 58.14 (a)	Only applies to year of or after 5-year network assessment	Add/correct in following year's plan and withhold approval of that portion	Yes if plan was submitted, either with ANP or separately	If the plan would result in not meeting other requirements then withhold approval of that portion.	Shall develop and implement. Final plan subject to approval by RA.	N	N
38	All additions and discontinuations of SLAMS have been subject to approval according to 58.14	58.10 (e)		Withhold approval of that portion. Work separately with agency to obtain information needed to approve modification		If modification does not meet req: withhold approval of that portion.		Y for some sites: DV, high conc, co-located, etc.	Y

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⁴ The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

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				and approve outside ANP process. List in following year's plan.					
39	Precision/Accuracy reports submitted to AQS	App. A		Add/correct in following year's plan.		N/A – req. met if correct info submitted	Must => WOE	N	N
40	Annual data certification submitted	App. A		Add/correct in following year's plan and withhold approval of that portion.		N/A – req. met if correct info submitted	Must => WOE	Y	Y
41	Frequency of flow rate verification for manual PM samplers audit	App A, 3.3.2		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
42	Frequency of flow rate verification for automated PM analyzers audit	App A, 3.2.3		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
43	Frequency of one-point flow rate verification for Pb	App A, 3.3.4.1		Add/correct in following		If frequency does not meet	Must => WOE	WOE	N

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	samplers audit			year's plan.		requirement then withhold approval of that portion.			
44	Frequency of one-point QC check (gaseous)	App. A, 3.2.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
45	Date of last Annual Performance Evaluation (gaseous)	App. A, 3.2.2		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
46	Dates of last two semi-annual flow rate audits for PM monitors	App A 3.2.4 and 3.3.3		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
47	Dates of last two semi-annual flow rate audits for Pb monitors	App A 3.3.4.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
48	PM2.5 co-location			Add/correct in following year's plan		If co-location does not meet requirement	Must => WOE	Y	Y

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				and withhold approval of that portion.		then withhold approval of that portion.			
49	Manual PM10 method co-location (note: continuous PM10 does not have this requirement) 15% for each “network of manual PM10 methods	App. A 3.3.1		Add/correct in following year’s plan and withhold approval of that portion.		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
50	Pb co-location 1 st collocated site must be at highest site in the network (unless RA grants a waiver). Collo samples at minimum 1:12. a) If have more than just Pb at NCore, must collocate at 15% of sites (at least one). b) If network only has Pb at NCore, part of national collocation network. Collocated monitors must be same method as primary.	App. A 3.3.4.3		Add/correct in following year’s plan and withhold approval of that portion.		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
51	PM10-2.5 co-location – only applies to Fresno and Phoenix NCore sites	App. A 3.3.6		Add/correct in following year’s plan.		N/A – HQ req.	Must => WOE	N	N
52	PM2.5 PEP audits	App. A (3.2.7)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
53	Pb PEP audits	App. A		Check EPA	EPA	EPA adjusts	EPA req.	Y	N

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Comment [MF3]: Only manual methods are required to be collocated (15% for each “network of manual PM10 methods). Continuous PM10 does not have a requirement...

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		(3.3.4.4)		records.	requirement	schedule			
54	NPAP audit	App. A (2.4)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
55	Instrument/monitoring method code for each monitor: is it reported properly? Is it reported correctly (i.e., appropriate method code for regulatory monitors)?	App. C		Add/correct in following year's plan and withhold approval of that portion.		N/A – req. met if correct info submitted	must	Y	Y
56	Placeholder for: Optional request to have PM2.5 continuous instruments treated as non-FEMs and therefore not comparable to NAAQS?	Proposed rule and memo		Assume all FEM instruments are comparable to NAAQS (see previous item)		If the evidence to treat FEMs as non-FEMs is not compelling: withhold approval of that portion and treat all FEMs as regulatory monitors		Y – starts in 2013 ANP?	Y if request is included – starts in 2013 ANP?
57	Start date for each monitor	App. C		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must	Y – info is needed for valid DV determ. but can be obtained from AQS	Y
58	Instrument monitor type for			Add/correct	Yes if	N/A – req.		Y – ID	Y

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	each monitor			in following year's plan and withhold approval of that portion.	correct info was submitted	met if correct info submitted		non-reg. monitors	
59	Monitoring objective for each instrument	App. D 1.1		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must	N	Y
60	Site type for each instrument	App. D 1.1.1		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted		N	Y
61	Instrument parameter code for each instrument			Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted		Y	Y
62	Instrument parameter occurrence code for each instrument			Add/correct in following year's plan.	Yes if correct info was submitted	N/A – req. met if correct info submitted		N	N

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63	Sampling season (note: date of waiver approval must be included if the sampling season deviates from requirement)	App. D		Add/correct in following year's plan and withhold approval of that portion.		If sampling season does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
64	Sampling schedule for PM _{2.5} <ul style="list-style-type: none"> • 1:3 (must at NCore and required reg background and reg transport sites) • Waiver for 1:6 at required SLAMS if data is not 5-10% away from either NAAQS and not 1 or more exceedances for prev 3 years • Daily if DV site and 5% of 24-hr NAAQS • Speciation at STN must be 1:3 	58.12(d)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
65	Sampling schedule for PM ₁₀	58.12(e)		Add/correct in following year's plan and withhold		If sampling schedule does not meet requirements or a deviation	must	Y	Y

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				approval of that portion.		has not been approved: withhold approval of that portion			
66	Sampling schedule for Pb	58.12(b)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	Must collect at 1:6 unless waiver	Y	Y
67	Sampling schedule for PM10-2.5 <ul style="list-style-type: none"> 1:3 (must at NCore if no continuous PM10-2.5 FEMs) PM10-2.5 speciation at NCore must operate 1:3 	58.12(f)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	Must collect at 1:3	N	Y
68	Minimum monitoring requirements ⁵ met for O3	App. D		Add/correct in following year's plan and		If minimum monitoring requirements are not met:	must	Y	Y

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⁵ Describe what has to be included (i.e., MSA, population, etc.).

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				withhold approval of that portion.		withhold approval of that portion			
69	Minimum monitoring requirements met for NO2	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
70	Minimum monitoring requirements met for SO2 Must be a) within CBSA boundary and be site type of: pop exposure, highest conc, source impacts, bkgd, or transport; or b) Can be outside CBSA if assesses the highest concentration for significant sources/source categories existing within CBSA. May be micro, middle, or neighborhood scale for max concentrations; may be urban scale for trends/transport/background.	App. D section 4.4		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
71	Minimum monitoring requirements met for CO	App. D		Add/correct in following year's plan and withhold		If minimum monitoring requirements are not met: withhold	must	Y – starting in 2015 ANP	Y – starting in 2015 ANP

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				approval of that portion.		approval of that portion			
72	Minimum monitoring requirements met for Pb (non airport sources >= 0.5 tpy; airports >= 1 tpy; at max concentration site taking into account logistics and population exposure; most appropriate scale = micro or middle), including for Pb at NCore (CBSAs with population of 500,000 or more; most appropriate scale = neighborhood.)	App. D section 4.5; 58.13(a)		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
73	Minimum monitoring requirements met for PM2.5 <ul style="list-style-type: none"> SLAMS & NCore are min # per Table D5 unless approved by RA 	App. D 4.7.1(a)		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
74	Network Design Criteria for PM2.5: <ul style="list-style-type: none"> Must represent community-wide air quality: neighborhood or urban scale, can be micro or middle scale if RA determines they represent many such 	App. D 4.7.1(b)		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y

Comment [m1]: Create cheat-sheet for requirement plus non-blue columns. Also include instructions on cheat sheet.

	ANP requirement	Citation within 40 CFR 58	Was the info submitted? If yes, page #s	Action if info is missing or incorrect	Does it meet the req?	Action if req. is not met (assumes correct info submitted)	Notes (for now on req. but ultimately for review notes)	Informs network adeq?	Critical for ANP app? ¹
	locations in the metropolitan area								
75	Is at least one site in a population-oriented area of expected maximum concentration	App. D 4.7.1(b)(1)		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	Is to be sited	Y	Y
76	If >1 SLAMS required, is there a site in an area of poor air quality	App. D 4.7.1(b)(2)		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	Is to be sited	Y	Y
77	Is there a requirement in this paragraph?	App. D 4.7.1(b)(3)							
78	Do the listed scales make sense given the other site information provided?	App D 4.7.1(b)(3)(1)-(5)							
79	Continuous PM2.5 monitoring <ul style="list-style-type: none"> # equal to half the required SLAMS (round up) If required, at least on collocated with a FRM/FRM/ARM Must use methods and QA/QC approved by 	App D 4.7.2					must	Y	Y

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	EPA RA								
80	Is there at least one regional background and one regional transport site in each state? (with EPA approved methodologies and QA/QC, can be non-FEMs)	App D 4.7.3					Must	Y	Y
81	PM2.5 Chemical Speciation: <ul style="list-style-type: none"> Continue operating sites designated as STN, including the right analyses and using approved methods 	App D 4.7.4					Shall continue		
82	Spatial Averaging for comparison to Annual NAAQS <ul style="list-style-type: none"> Are intended CMZs defined and meet criteria in 40 CFR 50 App N 	App D 4.7.5							
83	Minimum monitoring requirements met for PM10	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
84	Minimum monitoring requirements met for PM10-	App D 4.8		Add/correct in following		If minimum monitoring	must	N	Y

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	2.5 mass and speciation			year's plan and withhold approval of that portion.		requirements are not met: withhold approval of that portion			
85	Distance of site from nearest road	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
86	Traffic count of nearest road	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
87	Groundcover	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
88	Probe height	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
89	Distance from supporting structure	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
90	Distance from obstructions on roof	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
91	Distance from obstructions not on roof	App. E		Add/correct in following		Suggest corrective	followed to the maximum	N	N

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				year's plan.		action.	extent possible		
92	Distance from trees	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
93	Distance to furnace or incinerator flue	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
94	Distance between collocated monitors	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
95	Unrestricted airflow	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
96	Probe material (if applicable)	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
97	Residence time (if applicable)	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
98									
99	Not required as part of plan but good to check								
10	Start Date of FRM/FEM/ARM at SPM to	58.20(c) – (e)					Need info to judge	N	N

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	determine 24 months and information that App A, C or E requirements were not met						comparability to NAAQS		
10									
10									

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Comments

Use a weight of evidence approach.

For the letter, use some language like:

Based on the information that is in the Annual Network Plan, [EPA has determined that the Annual Network Plan meets the requirements listed in 40 CFR 58.10, except for ...] (use R1 language)

Create letter for late plans requesting whether plan will be submitted or confirming that there have been no changes.

Put in some order that is useful for review.

Add items that are not requirements but good to check – at end of checklist.